The following document was provided by Michael Rawson, Greg Devereaux and Manuel Pastor, Jr, Regional Targets Advisory Committee (RTAC) members, for consideration by the committee.

Housing and Social Equity

1. A Guiding Principal for Ambitious Targets

A guiding principal of RTAC is to maximize social equity (see Part 2), and this principal is incorporated in the recommendations of this Report (Parts 3 and 4). Social equity policies and practices that have the potential to reduce VMT (such as provision of affordable housing appropriate to local wage levels) must be elevated on the list of Best Management Practices that MPOs consider in developing their SCS. Accomplishing this will require CARB to designate social equity as an area of future research that CARB will conduct or direct be undertaken in the efforts to identify empirical evidence and then enhance modeling and monitoring. It will also require MPOs to engage low income communities in the SCS development process.

The affordability of housing and transportation and access to employment play a critical roll in determining where Californians live, how much they travel and, therefore, directly affect the level of achievable GhG reduction. Land use based GhG reduction strategies, however, could have beneficial or adverse effects on social equity concerns such as housing affordability (increased land prices), transportation access and affordability, displacement, gentrification, and a changing match between jobs, required skill levels and housing cost ("jobshousing fit"). Inequitable land use practices and inadequate public transit access as well as economic and racial segregation can result in exclusion, limitations on employment opportunities, sprawl and excess VMT. Implementation of SB 375, accordingly, should, at a minimum avoid facilitating or exacerbating any adverse consequences, work in concert with state Housing Element Law to achieve the state housing goals, and look for ways in which social equity strategies could improve GhG reduction.

2. Findings

The RTAC recognizes that increasing housing and transit affordability, and improving the jobs-housing fit in the SCS forecasted development areas should increase GhG reduction. It also recognizes that to ensure that GhG reduction targets are ambitious yet feasible and reasonably achievable, a) the methodologies utilized by the CARB and MPOs should analyze social equity factors to determine their GhG reduction benefits and b) the SCS/APS should consider and attempt to avoid adverse social equity consequences and should include social equity practices to the extent their GhG reduction benefits can be demonstrated. Incorporation of social equity factors is complimentary to the civil rights and environmental justice considerations required of regional transportation plans by federal and state law. At the same time the RTAC finds

¹ The extent to which the homes in the community are affordable to the people who currently work there or will fill anticipated jobs.

that existing modeling tools will need substantial upgrading to analyze and incorporate social equity factors into CARB's target setting and measurement of GhG reductions, and that appropriate research and development will be needed in the first period of implementation.

3. Recommendations

The RTAC makes these specific recommendations:

- 1. Social equity factors should be incorporated in the 2010 GhG target setting to the extent modeling or "off-modeling" methodologies exist² and in subsequent adjustments to the targets pursuant to §65080(b)(2)(A)(iv).
 3. [See also Part III—Target Setting Process.] Social equity factors include, but are not limited to, housing and transportation affordability, displacement/gentrification, and the jobs-housing fit.
- 2. CARB should take all steps necessary to ensure completion of the appropriate research and model development so that social equity factors are fully incorporated into the GhG modeling for the second SCS round and before any adjustments to the targets.
- 3. Adverse social consequences of changing land use patterns, such as displacement, gentrification and increased housing costs should be addressed and specifically avoided to the extent possible in the SCS/ACS submitted by MPOs pursuant to §65080(b)(2)(I)(i) and in the SCS/APS submitted to CARB pursuant to §65080(b)(2)(I)(ii).
- 4. To the extent adverse social consequences cannot be avoided they must be mitigated.
- Social Equity Practices that avoid adverse social consequences and will lead to GHG reduction must be included among the Best Management Practices described in Part III of this Report.
- 6. CARB should encourage the MPOs to develop and enhance "visioning" tools that allow the public and policymakers to clearly see the social equity impacts of various planning scenarios and make informed choices. These include impacts on air quality, access to transit, household transportation costs, housing costs and the overall housing supply.

4. Statutory Authority

§65080(b)(2)(A) [RTAC may consider impacts of jobs-housing balance & GhG reduction benefits from land use & transportation strategies]; §65080(b)(2)(B) [SCS must identify areas to house all economic segments and must consider State Housing Goals]; §65080.01 ["Feasible" means capable of being accomplished, taking into account economic & social factors among others]; §65580-§65589.8 [State housing goals and state Housing Element Law]

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² See, e.g. MTC's Transportation 2035 RTP, "Equity Analysis Report for the Transportation 2035 Plan of Change in Motion": http://www.mtc.ca.gov/planning/2035_plan/equity.htm.

³ All citations are to the Government Code.